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Before the

**Federal Communications Commission**  
Washington, D.C. 20554

In the Matter of )  
 )  
Amendment of Section 73.202(b) ) RM- \_\_\_\_\_  
Table of Allotments )  
FM Broadcast Stations )  
(Spencer and Webster, Massachusetts) )

RECEIVED  
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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

To: Chief, Allocations Branch,  
Policy and Rules Division,  
Mass Media Bureau

**PETITION FOR RULE MAKING**

Montachusett Broadcasting, Inc. ("MBI"), licensee of Station WORC-FM, Webster, Massachusetts, by its attorneys and pursuant to Section 1.401 of the Commission's rules, hereby requests that the Commission institute a rule making proceeding to amend Section 73.202(b) of the Commission's rules, the FM Table of Allotments, by reallocating Channel 255A from Spencer, Massachusetts, to Webster, Massachusetts, and modifying the license of Station WORC-FM accordingly. MBI seeks modification of the license for Station WORC-FM pursuant to Section 1.420(i) of the Commission's rules, which permits the modification of a station's license to specify a new community of license without affording other interested parties an opportunity to file competing applications. *See Modification of FM and TV Authorizations to Specify a new Community of License*, 4 FCC Rcd 4870 (1989), *recon. granted in part*, 5 FCC Rcd 7094 (1990) (the "Modification Order"). In support thereof, the following is shown:

DC-352059.1

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### **REALLOTMENT OF CHANNEL 255A TO SPENCER**

In response to a petition filed by Chowder Broadcast Group LLC ("Chowder"), the predecessor licensee of Station WORC-FM, the Commission adopted a Notice of Proposed Rule Making, 13 FCC Rcd 18797 (1998), requesting comments on the reallocation of Channel 255A from Webster, Massachusetts, to Spencer, Massachusetts, and modification of the license for Station WORC-FM (formerly WXXW) to specify Spencer as the community of license. Chowder filed supporting comments in which it reaffirmed its interest in Channel 255A at Spencer. No other comments were received in response to the Notice.

In a Report and Order adopted on January 20, 1999 in MM Docket No. 98-174, RM.-9356, the Chief of the Allocation Board reallocated Channel 255A from Webster to Spencer and modified the license of Station WROC-FM to specify operation at Spencer. Several months after the issuance of the above Report and Order, Chowder entered into an Asset Purchase Agreement to sell the assets of Station WROC-FM to MBI. An application was filed with the Commission on April 21, 1999, to assign the license of Station WORC-FM to MBI (BALH-990421EA, printed on June 8, 1999). On July 30, 1999, MBI became the licensee.

### **MBI'S SEARCH FOR A SITE TO SERVE SPENCER**

As shown in the attached Declaration of Robin B. Martin, President and Chief Executive Officer of MBI, as part of its due diligence prior to the execution of the APA, MBI reviewed the various engineering studies performed by Lawrence L. Morton Associates and Carl E. Smith Consulting Engineers for both Chowder and the predecessor licensee of the station. These studies concluded that a move of the city of license from Webster to Spencer would result in both

a theoretical coverage area much enlarged and improved from the station's current antenna site serving Webster and an increase in the population served. The studies specified the geographical area within which a tower could be located to meet FCC separation and city of license coverage requirements and included theoretical coverage maps from a tower site at an apparently randomly selected reference point which was later used in the Petition for Rule Making filed by Chowder. One of the studies included a map of predicted coverage and signal shadowing utilizing a more advanced computer program. MBI also had verbal discussions with Chowder about the possible advisability of a particular tower site. Based on this information, MBI had preliminary indications that a tower site might be found.

Before, during, and following the license transfer process, MBI spent considerable time and resources to study two critical concerns it had about the city of license change: (1) the ability to engineer a technically acceptable site; and (2) the ability to obtain land or tower space with all appropriate zoning and other permits at such a site. To resolve these concerns, MBI engaged in three activities: it hired outside engineering consultants; it employed a battery of attorneys in the local areas under consideration; and it dispatched its own professionals, including corporate officers, to inspect and study potential sites. The following is a summary of MBI's efforts to obtain a technically acceptable site:

- MBI hired three engineering consulting firms to study these issues (Evans Associates, in mid-February, 1999; Graham Brock, Inc., in mid-May, 1999; and R.M. Smith Associates, in early August 1999) to conduct additional studies to answer two basic questions: first, whether locations exist within the permissible area-to-locate that would allow the

generation of signal coverage consistent with the FCC-method predictions; and second, what tower heights would be required at such locations to accomplish acceptable coverage. For reasons set forth in detail in the attached Declaration, none of these engineers was able to propose a site that would meet an acceptable threshold of signal coverage consistent with FCC-method predictions at virtually any tower height.

- Jay Williams, Jr., an officer of MBI, and Robin Martin visited potential sites a number of times between March and July, 1999. They methodically drove from north to south through the permissible area-to-locate and the areas immediately adjacent, using both detailed road maps and USGS topographical maps with the engineering data superimposed. They personally inspected formally 27 separate possible sites, of which 15 are in the Town of North Brookfield, six in the Town of East Brookfield, four in the Town of Charlton and two in the Town of Sturbridge. In addition, they drove by dozens of other potential sites that could be ruled out for obvious reasons, such as high residential density, no land availability, or poor terrain or topographical conditions. They found all of these sites unacceptable from an engineering viewpoint.

- MBI hired attorneys from three different law firms who practice in the various jurisdictions under consideration for tower site locations (Robert Longden, Esq., Bowditch & Dewey, Worcester, MA; Mark Murphy, Esq., Sturbridge, MA; and Blaise Berthiaume, Esq., North Brookfield, MA). Each of these attorneys researched, obtained and analyzed the local zoning and other applicable ordinances in the area of his expertise and also provided information concerning land ownership and potential site availability for numerous locations. In many cases,

they had preliminary discussions with local governmental officials concerning the interpretation of certain zoning law provisions. There was not one specific site MBI explored or any general area that it examined that had appropriate zoning for the proposed use as a tower facility. Furthermore, there was no town jurisdiction within the permissible area-to-locate where construction of a new tower for FM antennas was a permitted use. Also, there are no existing tower structures in this area that meet the requirements for the Spencer facility.

Thus, after obtaining the benefit of the advice of numerous consulting engineers and lawyers and after engaging in a comprehensive search, MBI has concluded that there is no acceptable site for the relocation of the WORC-FM tower site that meets FCC requirements for serving its new city of license, Spencer, at which local approvals could be obtained.

**STATION WORC-FM'S EXISTING SITE:  
COMPLIANCE WITH FCC ALLOTMENT RULES**

As shown in the attached Engineering Statement of R. M. Smith Associates, MBI's consulting engineer, an allotment site specified as N42-01-36, W71-58-09 (the same location as the original allotment site for 255A, Webster, MA) is fully spaced in accordance with the requirements of Section 73.207(b)(1) of the Commission's rules to all domestic stations' allotments except Station WPLM-FM, Channel 256B, Plymouth, Massachusetts, and Station WPLR(FM), Channel 256B, New Haven, Connecticut. The Webster allotment site is fully spaced in accordance with the requirements of Section 73.213(c)(1) of the Commission's rules with respect to Stations WPLM-FM and WPLR(FM). The site is also fully spaced per the requirements of the U.S./Canadian FM Working Agreement to all Canadian stations/allotments. MBI hereby requests that the Section 73.207(b)(1) spacing requirement to Stations WPLR(FM)

and WPLM-FM be waived and this allotment be treated as a 3.0 kW at 100 meter EAH allotment as required when Commission granted the original Webster allotment.

WORC-FM is presently operating with facilities equivalent to 3.0 kW at 100 meters at a site meeting the requirement of 47 C.F.R. 73.213(c)(1). No increase in interference will occur to either WPLR(FM) or WPLM-FM as a result of a grant of this Petition. MBI requests that Station WORC-FM be allowed to continue to operate at its present site (N42-02-10, W71-59-23) with its present facilities (1.85 kW at 125 meters HAAT) pursuant to Section 73.213(c)(1) of the Commission's rules.

Restoration of the allotment of Channel 255A to Webster, at the original allotment site with Station WORC-FM operating with its present facilities will provide 70 dBu coverage to Webster, both a full Class A facility (3.0 kW at 100 meters EAH) at the allotment site and Station WORC-FM's present operation. WORC-FM's present operation, however, cannot provide 70 dBu coverage of Spencer. MBI's consulting engineer was unable to locate an allotment site which complied with Commission spacing requirements that would provide 70 dBu coverage of Webster. Indeed, as indicated in the Engineering Statement, the site closest to Webster meeting all of the spacing requirements of Section 73.207 is 18.5 km from the center of Webster. A full Class A facility at that location would cover less than 50% of the town of Webster with a 70 dBu or better signal.

WHEREFORE, for the foregoing reasons, MBI respectfully requests that the Commission amend the FM Table of Assignments by reallocating Channel 255A from Spencer to Webster, and that Station WORC-FM be allowed to continue to operate at its present site (N42-

02-10, W71-59-23) with its currently licensed facilities (1.85 kw at 25 meters HAAT) pursuant to Section 73.213(c)(1) of the Commission's rules.

Respectfully submitted,

**MONTACHUSETT BROADCASTING, INC.**

By:   
Erwin G. Krasnow

Verner, Liipfert, Bernhard, McPherson and Hand  
901 15<sup>th</sup> Street, N.W., Suite 700  
Washington, DC 20005

Its Attorney

November 12, 1999

DECLARATION OF ROBIN B. MARTIN, PRESIDENT AND CHIEF EXECUTIVE  
OFFICER OF MONTACHUSETT BROADCASTING, INC.

Robin B. Martin, under penalty of perjury, hereby deposes and declares as follows:

I am the President and Chief Executive Officer of Montachusett Broadcasting, Inc. (MBI), licensee of WORC-FM. The following is a summary of the steps taken by MBI to secure a tower facility for WORC-FM that meets the various requirements for Spencer, Massachusetts, as its new city of license.

On April 30, 1998, Chowder Broadcast Group, L.L.C. (Chowder), as the previous licensee of WXXW(FM) (now WORC-FM), filed a Petition for Rule Making with the Federal Communications Commission (FCC) seeking the allotment of Channel 255A from Webster, Massachusetts, to Spencer, Massachusetts. The change in allocation was approved by the FCC in a Report and Order released on January 29, 1999. On April 7, 1999, MBI signed an asset purchase agreement (APA) to acquire the assets of WORC-FM from Chowder. The FCC approved the transfer and the transaction closed on July 27, 1999.

As part of its due diligence prior to the execution of the APA, MBI reviewed the various engineering studies performed for Chowder and the predecessor licensee of the station that examined the possibilities and ramifications of improving signal coverage and serving a larger population by changing the city of license. These studies concluded that a move of the city of license from Webster to Spencer would result in both a theoretical coverage area much enlarged and improved from the station's current antenna site serving Webster and an increase in the population served. These studies, prepared by Lawrence L. Morton Associates, Mesa Oaks, CA, and Carl E. Smith Consulting Engineers, Bath, OH, specified the geographical area within which a tower could be located to meet FCC separation and city of license coverage requirements. The studies also included theoretical coverage maps from a tower site at an apparently randomly selected reference point that was later used in the Petition for Rule Making. One of the studies included a map of predicted coverage and signal shadowing utilizing a more advanced computer program. MBI also had verbal discussions with Chowder about the possible availability of one tower site. Based on this information, MBI had some preliminary indications that a tower site might be found.

Before, during, and following the license transfer process, MBI spent considerable time and resources to study two critical concerns it had about the city of license change: the ability to engineer a technically acceptable site; and the ability to obtain land or tower space with all appropriate zoning and other permits at such a site. To resolve these concerns, MBI engaged in three activities: it hired outside engineering consultants; it employed a battery of attorneys in the local areas under consideration; and it dispatched its own professionals, including corporate officers, to inspect and study potential sites.



Notwithstanding the studies performed for Chowder, MBI hired its own consulting engineers to conduct additional studies to answer to its own satisfaction two basic questions: first, do locations exist within the permissible area-to-locate that would allow the generation of signal coverage consistent with the FCC-method predictions; and second, what tower heights would be required at such locations to accomplish acceptable coverage. Ultimately, MBI hired three separate engineering consulting firms to study these issues. MBI hired Evans Associates, Thiensville, WI, in mid-February, 1999; Graham Brock, Inc., St. Simons Island, GA, in mid-May, 1999; and R.M. Smith Associates, Windham, NH, in early August, 1999.

Each of these firms concluded that the new city of license presented extremely complex and difficult challenges for tower siting. Due to the first and second adjacent channel signals within a relatively close range, the permissible area-to-locate the tower is small and contains rugged, undulating terrain, with many knobs, ridges, deep valleys, and other topology considered hostile to FM propagation, in a mix of populated and rural areas. None of these engineers could propose a site that would meet an acceptable threshold of signal coverage consistent with FCC-method predictions at virtually any tower height. The reasons for this lack of success revolve around two primary issues: first, the terrain located between potential tower sites and the bulk of the population predicted to be served rises significantly and broadly into ridge-like terrain, therefore creating an insurmountable barrier to propagation. Due to the permissible area-to-locate restrictions, any tower site that meets the separation and city grade requirements must be located at least five to seven miles away from the "ridge", which therefore effectively blocks the signal in the direction of the major population centers. And second, even at the sites deemed poor but the best to be expected, the tower heights needed were unacceptably high, both from cost and zoning perspectives.

Jay Williams, Jr., the chief operating officer of MBI, and I visited these areas a number of times between March and July, 1999. We methodically drove from north to south through the permissible area-to-locate and the areas immediately adjacent, using both detailed road maps and USGS topographical maps with the engineering data superimposed. We personally inspected formally 27 separate possible sites, of which 15 are in the Town of North Brookfield, six in the Town of East Brookfield, four in the Town of Charlton and two in the Town of Sturbridge. In addition, we drove by dozens of other potential sites that could be ruled out for obvious reasons, such as high residential density, no land availability, or poor terrain or topographical conditions. We found all of these sites unacceptable from an engineering viewpoint.

MBI, however, was prepared to lower its standards and accept a less than optimal site if an acceptable tower site could be found that met local legal requirements. Therefore, as a first condition, all FCC and other governmental requirements would need to be met at a potential site. (We did additionally investigate sites that were outside of the permissible area-to-locate that might be buildable as short-spaced facilities.) To assist in these determinations, MBI hired a series of attorneys who practice in the various jurisdictions under consideration for tower site locations. They

included Robert Longden, Esq., Bowditch & Dewey, Worcester, MA; Mark Murphy, Esq., Sturbridge, MA; and Blaise Berthiaume, Esq., North Brookfield, MA. Each of these attorneys researched, obtained and analyzed the local zoning and other applicable ordinances in the area of his expertise and also provided information concerning land ownership and potential site availability for numerous locations. In many cases, they had preliminary discussions with local governmental officials concerning the interpretation of certain zoning by-law provisions. There was not one specific site we explored or any general area that we examined that had appropriate zoning for the proposed use as a tower facility. Furthermore, there was no town jurisdiction within the permissible area-to-locate where construction of a new tower for FM antennas was a permitted use. And there are no existing tower structures in this area that meet the requirements for the WORC-FM transmission facility.

In conclusion, upon obtaining the benefit of the advice of numerous consulting engineers and lawyers and after engaging in a comprehensive search, MBI has concluded that there is no acceptable site for the relocation of the WORC-FM tower site that meets the FCC requirements for serving its new city of license, Spencer, at which local approvals could be obtained.

Montachusett Broadcasting, Inc.

  
By: Robin B. Martin,  
President and Chief Executive Officer

Date: 11/4/99

# **R. M. SMITH ASSOCIATES**

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## **ENGINEERING STATEMENT**

**IN SUPPORT OF  
PETITION FOR RULE MAKING**

**BY:  
MONTACHUSETT BROADCASTING, INC.**

November 1999

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## **PURPOSE AND SCOPE**

The Petition for Rule Making, by Montachusett Broadcasting, Inc. ("Montachusett"), licensee of Station WORC-FM, Webster, Massachusetts, of which this Engineering Statement is a part, requests a modification of the FM Table of Allotments in 47 CFR 73.202 by deleting the vacant allotment of channel 255A at Spencer, MA<sup>1/</sup>, and restoring an allotment of channel 255A at Webster, MA.<sup>2/</sup> This Statement supports the Petition by showing that the proposed reallocation complies with applicable spacing requirements as explained herein, and provides 70 dBu coverage over the proposed community of license.

## **BACKGROUND**

Channel 255A was originally allotted to Webster, MA in MM Docket No. 86-145. Station WORC-FM has occupied that allotment since its inception. Prior to the sale of the assets of WORC-FM to Montachusett, the previous owner petitioned the Commission to change the allotment to Spencer, MA. The reallocation of channel 255A from Webster to Spencer was granted by the Commission in MM Docket 98-174. Both before and immediately after the transfer of license, Montachusett made a diligent effort to relocate the WORC-FM transmitter site to serve the town of Spencer pursuant to the allotment as ordered in the Report and Order in MM Docket No. 98-174. Attached to this Petition is a Declaration by Montachusett outlining those efforts. Since Montachusett has been unsuccessful in relocating WORC-FM to Spencer,

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<sup>1/</sup> Channel 255A at Spencer, MA is a vacant allotment reserved for the operation of WORC-FM at Spencer, MA. WORC-FM has never operated in Spencer, MA and has never provided service to that community from the allotment site nor any other site.

<sup>2/</sup> WORC-FM is operating from its licensed site, constructed when channel 255A was allotted to Webster, MA.

MA, it is hereby requesting, pursuant to 47 C.F.R. 1.420(i), that the allotment of channel 255A be returned to Webster, MA. Section 1.420(i) permits the modification of a station's authorization to specify a new community of license without affording other interested parties an opportunity to file competing expressions of interest.

### **ALLOTMENT SPACING**

An allotment site specified as N42-01-36, W71-58-09 (the same location as the original allotment site for 255A, Webster, MA) is fully spaced per the requirements of 47 CFR 73.207(b)(1) to all domestic stations/allotments except WPLM-FM, 256B, Plymouth, MA and WPLR(FM), 256B, New Haven, CT (see attached FM Spacing Study). The Webster allotment site is fully spaced per the requirements of 47 C.F.R. 73.213(c)(1) with respect to WPLM-FM and WPLR(FM). The site is fully spaced per the requirements of U.S./Canadian FM Working Agreement to all Canadian stations/allotments. Montachusett requests that the 47 CFR 73.207(b)(1) spacing requirement to WPLR(FM) and WPLM-FM be waived and this allotment be treated as a 3.0 kW at 100 meter EAH allotment as required when Commission granted the original Webster allotment.

The undersigned was unable to locate an allotment site complying with all applicable current F.C.C. spacing requirements that would provide 70 dBu coverage to Webster, MA. The site closest to Webster meeting all of the spacing requirements of 47 C.F.R. 73.207 is 18.5 km from the center of Webster. A full Class A facility at that location would cover less than 50% of the town of Webster with a 70 dBu or better signal. If that search had been successful, WORC-FM would have no longer been eligible for processing pursuant to 47 C.F.R. 73.213 since its allotment site would be fully spaced per 47 C.F.R. 73.207.

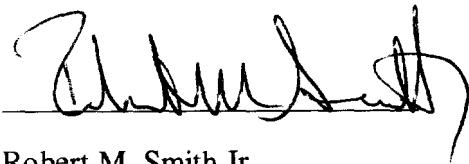
WORC-FM is presently operating with facilities equivalent to 3.0 kW at 100 meters at a site meeting the requirement of 47 C.F.R. 73.213(c)(1). No increase in interference will occur to either WPLR(FM) or WPLM-FM as a result of a grant of this Petition. It is further requested that WORC-FM be allowed to continue its present operation at its present site (N42-02-10, W71-59-23) with its present facilities (1.85 kW at 125 meters HAAT) pursuant to 47 C.F.R. 73.213(c)(1).

### **PRINCIPAL COMMUNITY COVERAGE**

Restoration of the allotment of channel 255A to Webster, MA at the original allotment site with WORC-FM operating with its present facilities will provide 70 dBu coverage to Webster, MA by both a full Class A facility (3.0 kW at 100 meters EAH) at the allotment site and WORC-FM's present operation. WORC-FM's present operation, however, cannot provide 70 dBu coverage of Spencer, MA.

### **CERTIFICATION**

I, Robert M. Smith Jr., of Windham, NH do hereby certify that all of the data, calculations and statements in this application are true and correct to the best of my knowledge and belief. I further certify that I am an experienced and qualified broadcast engineer and that my qualifications are a matter of record with the Commission.

A handwritten signature in black ink, appearing to read 'Robert M. Smith Jr.', is written over a horizontal line.

Robert M. Smith Jr.

FM SPACING STUDY

Title: Webster Allotment Site

Channel Studied: 255  
Safety Zone (km): 50

Latitude: 42-01-36  
Longitude: 071-58-09

Chan Freq Auth.	City Licensee FCC File No.	St Call	ERP-kW EAH-m	Latitude Longitude	Dist Br-To	Required Clearance Result
252A 98.3 USED	Willimantic -	CT ALLOC		41-41- 0 72-12-59	43.3 208.3	31 12.3 CLEAR
252A 98.3 LIC	Willimantic Nutmeg Broadcasting Company, Inc. BLH-870402KB	CT WILIFM	1.05 160	41-41- 0 72-12-59	43.3 208.3	31 12.3 CLEAR
253B 98.5 USED	Boston -	MA ALLOC		42-18-27 71-13-27	69.0 63.1	69 .0 CLOSE
253B 98.5 LIC	Boston American Radio Systems License Corpo BLH-900131KB	MA WBMX	9.0 349	42-18-27 71-13-27	69.0 63.1	69 .0 CLOSE
254A 98.7 LIC	Winchester Roberts Communications, Inc. BLH-950630KD	NH WXOD	1.75 187	42-54-57 72-19-48	103.1 343.3	72 31.1 CLEAR
254A 98.7 LIC	East Lyme Hall Communications, Inc. BLH-950818KI	CT WNLC	5.5 82	41-23- 5 72- 4-13	71.8 186.7	72 -.2 SHORT
254A 98.7 USED	East Lyme -	CT ALLOC		41-21-39 72- 7-39	75.1 190.1	72 3.1 CLOSE
254A 98.7 USED	Winchester -	NH ALLOC		42-46-18 72-23- 0	89.5 337.6	72 17.5 CLEAR
255A 98.9 USED	Webster -	MA ALLOC		42- 1-36 71-58- 9	.0 .0	115 -115.0 SHORT
255A 98.9 LIC	Webster Okun Broadcasting Corporation BLH-940418KC	MA WORCFM	1.85 125	42- 2-10 71-59-23	2.0 301.6	115 -113.0 SHORT
255A 98.9 VACA	Spencer -	MA ALLOC		42-11- 0 72- 2-30	18.4 341.0	115 -96.6 SHORT

FM SPACING STUDY

Title: Webster Allotment Site

Channel Studied: 255  
Safety Zone (km): 50

Latitude: 42-01-36  
Longitude: 071-58-09

Chan Freq Auth.	City Licensee FCC File No.	St Call	ERP-kW EAH-m	Latitude Longitude	Dist Br-To	Required Clearance Result
256B 99.1 USED	New Haven -	CT ALLOC		41-25-23 72-57- 6	105.7 230.6	113 -7.3 SHORT
256B 99.1 LIC	Plymouth Plymouth Rock Broadcasting Co., Inc. BLH-7410	MA WPLMFM	50.0 131	41-58- 2 70-42- 4	105.3 93.6	113 -7.7 SHORT
256B 99.1 USED	Plymouth -	MA ALLOC		41-58- 2 70-42- 4	105.3 93.6	113 -7.7 SHORT
256B 99.1 LIC	New Haven Capstar Broadcasting of Connecticut BLH-971210KF	CT WPLR	15.0 276	41-25-23 72-57- 6	105.7 230.6	113 -7.3 SHORT
257A 99.3 USED	Northampton -	MA ALLOC		42-22-29 72-40-24	69.8 303.6	31 38.8 CLEAR
257A 99.3 LIC	Northampton Multi-Market Radio of Northampton, I BLH-960520KD	MA WHMPFM	6.0 99	42-22-29 72-40-24	69.8 303.6	31 38.8 CLEAR
257A 99.3 CP M	Northampton SFX Broadcasting of Massachusetts Li BMPH-970429IE	MA WHMPFM	5.8 101	42-22-25 72-40-26	69.8 303.5	31 38.8 CLEAR
258B 99.5 LIC	Lowell Greater Los Angeles Radio, Inc. BLH-980901KD	MA WKLBFM	26.0 203	42-39-14 71-13- 2	93.2 41.7	69 24.2 CLEAR
258B 99.5 USED	Lowell -	MA ALLOC		42-39-16 71-13- 9	93.2 41.5	69 24.2 CLEAR
258B 99.5 APP	Lowell Greater Los Angeles Radio, Inc. BMLH-990310KE	MA WKLBFM	28.5 203	42-39-14 71-13- 2	93.2 41.7	69 24.2 CLEAR
201A 88.1 LIC	Providence The Wheeler School BLED-941228KB	RI WELH	0.15V 30V	41-51-30 71-19- 4	57.2 109.1	10 47.2 CLEAR



FM SPACING STUDY

Title: Webster Allotment Site

Channel Studied: 255  
Safety Zone (km): 50

Latitude: 42-01-36  
Longitude: 071-58-09

Chan	City	St Call	ERP-kW	Latitude	Dist	Required
Freq	Licensee		EAH-m	Longitude	Br-To	Clearance
Auth.	FCC File No.					Result

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201A	Worcester	MA WCHC	0.1V	42-14-15	26.9	10
88.1	College of the Holy Cross		-2V	71-48-31	29.5	16.9
LIC	BLED-880916KA					CLEAR
202A	Franklin	MA WGAO	0.175	42- 5- 8	47.7	10
88.3	Dean College		58	71-23-54	82.1	37.7
LIC	BLED-941229KB					CLEAR